

REMARKS

Claims 1-9, 12-48 and 53-62 are pending.

Claims 1, 8, 28, 40, 43, 58, 60, and 61 have been amended.

Claims 10, 11, and 49-52 have been canceled without prejudice or disclaimer of the subject matter recited therein.

Claims 63-70 have been added.

Claim Rejections - 35 U.S.C. § 103

I.

Claims 1, 8, 9, 12-17, 23-42, 44-48, and 53-62 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Application No. 2005/0055420 to Wyler (referred to herein as “*Wyler*”) in view of U.S. Patent No. 6,941,511 to Hind et al. (referred to herein as “*Hind*”). Applicant respectfully traverses the rejection.

Independent Claims

Claim 1.

Wyler relates to a system for providing information in a form suitable for display to a user on a wireless device. *Wyler*, Abstract. More specifically, *Wyler* teaches a first level process involving a Web source file or input text file search to determine “what kind of process is needed in order to transform its information into objects” followed by translation into M2O script language. *Wyler*, paras. 155-163. *Wyler* next teaches a second level process involving “parsing, analyzing and converting [content] into M2O script language.” *Id.*, para. 164.

Claim 1 recites applying two different transforms. Namely, claim 1 recites “applying the first-level transform to the internal representation so as to create a first-level document” and “applying the second-level transform to the first-level document so as to create a second-level document.” Even assuming *arguendo* that the second level process of *Wyler* is analogous to “applying the second-level transform” as recited in claim 1, *Wyler* fails to teach that the second level process is a demand-driven process. More specifically, *Wyler* fails to teach “receiving a

first request for a second-level document that depends from the first-level document” and “in response to the first request, applying the second-level transform to the first-level document so as to create a second-level document.” Claim 1.

For the first level process, *Wylar* teaches that “The application searches the Web source page or an input text file ... and determines what kind of process is needed in order to transform its information into objects.” *Wylar*, para. 158. Next, “[t]he application passes the page content to one of [] three [] functions.” *Id.*, para. 159. After the first level process, *Wylar* states that “In this [second] level the application removes irrelevant information.” *Id.*, para. 165. Thus, the application in *Wylar* automatically moves from the first level process to the second level process. Significantly, *Wylar* does not teach a demand driven process for the second level process. Applicant respectfully submits that *Wylar* automatically performs the second level process after the first level process rather than performing the second level process in response to a specific request.

Thus, in contrast to the automatic nature of initiating the second level process of *Wylar*, claim 1 is a demand driven process that specifically recites “receiving a first request for a second-level document that depends from the first-level document” and “in response to the first request, applying the second-level transform to the first-level document so as to create a second-level document.” This demand driven process is not inconsequential. The Present Application states that, “The demand-driven nature of the process is especially relevant in light of potential requirement for a combinatorial number of generated documents, all derived from the initial XML documents.” (Note, the foregoing information is for illustrative purposes only. The invention is limited by the claims and not by specific embodiments described in the Present Application).

Hind relates to “a method, system, and computer program product for applying transformations to extensible documents, enabling reductions in the processing time required to transform arbitrarily-structured documents having particular well-defined elements.” *Hind*, Abstract. Beginning on col. 14, line 46, *Hind* describes the “processing that occurs when an arbitrary incoming document arrives at run time, and is to be transformed.” As with *Wylar*, *Hind* fails to teach or suggest the particular demand-driven process of Claim 1 set forth above.

Accordingly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 1.

Claim 8.

Claim 8 is a “method of generating customized versions of a document using a computer system” and recites “receiving a request to generate a second-level document” and “decomposing the document, wherein decomposing the document comprises ...in response to the request to generate the second-level document, applying a second-level transform to the first-level document so as to create the second-level document.” Thus, for at least the same reasons set forth with regard to Claim 1, *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 8.

Accordingly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 8.

Claim 28.

Claim 28 is a “computer readable medium having data stored therein to cause a data processing system to generate a data document according to a process” and recites “receiving a request from a client computer system coupled to the data processing system to generate a second-level document into a particular form” and “decomposing the document, wherein decomposing the document into [[a]] the form requested by the client system ... comprises ...in response to the request to generate the second-level document, applying a second-level transform to the first-level document so as to create the second-level document.” Thus, for at least the same reasons set forth with regard to Claim 1, *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 28.

Accordingly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 28.

Claim 53.

Claim 53 is a “method of generating customized versions of a document using a computer system.” *Wylar* teaches that for a Web source page or an input text file, “the application passes the page content to one” of the three functions. *Wylar*, paras. 159-162.

(emphasis added). Regardless of which function the application passes the page to, each function translates the Web source page or input text file into “M2O script language”. *Id.* Thus, for each page, *Wylar* creates only *one* M2O script language document. In contrast to *Wylar*, claim 53 transforms an internal representation of a document into at least three different documents. More specifically, claim 53 recites “transforming the internal representation into at least one subscription-level document, into a DEFAULT organization-level document and into at least one user-specific organization-level document.” Claim 53. (emphasis added).

Also, the Office Action, p. 10, states that *Wylar* teaches that the second level parsing “organizes the page into regions for the article.” Applicant respectfully submits that para. 167 of *Wylar* teaches that web pages are organized into regions by a webpage designer and not by the processes of *Wylar*. *Wylar* states that “Before insertion of content into the webpage, the webpage designer organizes the page into regions.”

Accordingly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 53.

Claim 58.

As previously stated, *Wylar* teaches a first level process involving a Web source file or input text file search to determine “what kind of process is needed in order to transform its information into objects” followed by translation into M2O script language. *Wylar*, paras. 155-163. *Wylar* also teaches a second level process involving “parsing, analyzing and converting (into M2O script language.” *Id.*, para. 164.

Claim 58 includes transforms that enable “an internal representation of a document to be transformed into a first-level document and that enable the first-level document to be transformed into a second-level document.” Even assuming *arguendo* that a transform into a second level document is analogous to the second process of *Wylar*, *Wylar* fails to teach that the second level process is a demand-driven process. More specifically, *Wylar* fails to teach “a document generator ... to generate the first level document using at least one of the transforms and to generate the second-level document using at least one of the transforms **in response to receipt of the document generation request**, wherein the document type of the second-level

document and the transform used to generate the second-level document are indicated by the document generation request.” Claim 58.

For the first level process, *Wylar* teaches that “The application searches the Web source page or an input text file ... and determines what kind of process is needed in order to transform its information into objects.” *Wylar*, para. 158. Next, “[t]he application passes the page content to one of [] three [] functions.” *Id.*, para. 159. After the first level process, *Wylar* states that “In this [second] level the application removes irrelevant information.” *Id.*, para. 165. Thus, the application in *Wylar* automatically moves from the first level process to the second level process. Significantly, *Wylar* does not teach a demand driven process for the second level process. Applicant respectfully submits that *Wylar* automatically performs the second level process after the first level process rather than performing the second level process in response to a specific request.

Thus, in contrast to the automatic nature of initiating the second level process of *Wylar*, claim 58 is a demand driven process that specifically recites “a request interface to receive a document generation request, wherein the document generation request indicates a particular document type” and “a document generator to generate the second-level document using at least one of the transforms in response to receipt of the document generation request.” As previously stated, this demand driven process is not inconsequential. The Present Application states that, “The demand-driven nature of the process is especially relevant in light of potential requirement for a combinatorial number of generated documents, all derived from the initial XML documents.” (Note, the foregoing information is for illustrative purposes only. The invention is limited by the claims and not by specific embodiments described in the Present Application).

Hind relates to “a method, system, and computer program product for applying transformations to extensible documents, enabling reductions in the processing time required to transform arbitrarily-structured documents having particular well-defined elements.” *Hind*, Abstract. Beginning on col. 14, line 46, *Hind* describes the “processing that occurs when an arbitrary incoming document arrives at run time, and is to be transformed.” As with *Wylar*, *Hind* fails to teach or suggest the particular demand-driven process of Claim 58 set forth above.

Accordingly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 58.

Selected Dependent Claims.

Claim 39.

Claims 39 recites “wherein the data document is generated according to a process comprising: tracking the dependencies of a transformed document; and regenerating the transformed document when any dependency related to the document changes.” The Office Action, p. 8 cites para. 550 of *Wylar* to rejection claim 39. *Wylar* analyzes webpages “to provide the information in a form suitable for display to a user on the wireless device.” *Wylar*, Abstract. In para. 550, *Wylar* teaches identifies different types of analyses that can be conducted on a webpage. “For example, analysis may differ for homepages and for pages which are not homepages because homepages typically share common characteristics which are not typically shared by webpages other than homepages.” *Id.*, para. 550. Applicant respectfully submits that ‘homepages’ and ‘pages which are not homepages’ are not in a dependent relationship, e.g. the content of the non-homepage is not dependent upon the homepage. Commonality exists between homepages but *Wylar* does not equate commonality with dependency.

The Office Action states that “The parent web page shares common characteristics, whereas, children webpages present differentials depending on the type of web page.” Applicant respectfully submits that the Examiner has introduced the terms “parent” and “children” into the teachings of *Wylar* to indicate a dependency where none actually exists. *Wylar* does not use the terms “parent” and “children”. *Wylar* indicates that “homepages typically share common characteristics”, i.e. one homepage has characteristics in common with another homepage. *Wylar* also indicates that the characteristics of non-homepage webpages are different than homepages. Applicant respectfully submits that homepages that have common characteristics and non-homepages with different characteristics does not indicate a dependent relationship.

Thus, *Wylar* simply differentiates between the two categories of pages for the purpose of applying the appropriate analytics. Applicant respectfully submits that differentiating between two categories does not teach or suggest “tracking the **dependencies** of a transformed document.” Claim 39.

Additionally, *Wylar* fails to teach or suggest “regenerating the transformed document when any dependency related to the document changes.” Claim 39. Applicant submits that *Wylar* in view of *Hind* does not teach or suggest any regeneration of a transformed document, does not teach “tracking the dependencies of a transformed document”, and, thus, cannot teach or suggest “regenerating the transformed document when any dependency related to the document changes.” *Id.*

Accordingly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of claim 39.

Similarly, Applicant respectfully submits that *Wylar* in view of *Hind* fails to teach or suggest the present invention of new claims 64, 66, 68, and 70.

Additionally, Applicant respectfully submits that rejected claims dependent upon independent claims 1, 8, 28, 53, or 58 are allowable for at least the same reasons as the independent claim from which the dependent claim directly or indirectly depends.

II.

Claims 2-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wylar* in view of *Hind*, and further in view of U.S. Patent No. 6,772,413 to Kuznetsov (referred to herein as “*Kuznetsov*”). Applicant respectfully traverses the rejection.

Applicants respectfully submit that claims 2-5 are allowable for at least the same reasons as independent claim 1.

III.

Claims 6 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wylar* in view of *Hind*, and further in view of Application No. 2002/0013792 to Chau (referred to herein as “*Chau*”). Applicant respectfully traverses the rejection.

Applicants respectfully submit that claims 6 and 7 are allowable for at least the same reasons as independent claim 8.

IV.

Claims 18-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wylor* in view of *Hind*, and further in view of Application No. 2003/0014414 to Newman (referred to herein as “*Newman*”). Applicant respectfully traverses the rejection.

Applicants respectfully submit that claims 18-22 are allowable for at least the same reasons as independent claim 8.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

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Respectfully submitted,

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